

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MONIQUE RUSSELL, JASMINE RIGGINS,  
ELSA M. POWELL, and DESIRE EVANS,

Plaintiffs,

v.

EDUCATIONAL COMMISSION FOR  
FOREIGN MEDICAL GRADUATES,

Defendant.

Civil Action No. 18-5629

Honorable Joshua D. Wolson

**DEFENDANT’S UNOPPOSED MOTION TO SEAL**

For the reasons set forth in the attached memorandum of law, Defendant Educational Commission for Foreign Medical Graduates, by and through its undersigned counsel, moves to seal Defendant’s Memorandum of Law in Support of Its Motion for Summary Judgment, Defendant’s Statement of Undisputed Material Facts, and Exhibits 42, 44, 45, 46, 47, 53, 55, 57, 59, 63, 67, and 74 thereto.

Dated: December 10, 2021

Respectfully submitted,

/s/ Brian W. Shaffer

Brian W. Shaffer, PA Bar No. 78851  
Elisa P. McEnroe, PA Bar No. 206143  
Matthew D. Klayman, PA Bar No. 319105  
MORGAN, LEWIS & BOCKIUS, LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
Telephone: +1.215.963.5000  
Facsimile: +1.215.963.5001  
brian.shaffer@morganlewis.com  
elisa.mcenroe@morganlewis.com  
matthew.klayman@morganlewis.com

*Attorneys for the Educational Commission for  
Foreign Medical Graduates*

**CERTIFICATE OF SERVICE**

I do hereby certify that on this date, I caused true and correct copies of the foregoing document to be served via electronic filing upon all counsel of record via the ECF system and/or e-mail.

DATED: December 10, 2021

/s/ Brian W. Shaffer  
Brian W. Shaffer